

Message

From: Lundelius, Diana [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=998193F6F9904EA4AB438772B62DD7EA-LUNDELIUS, DIANA]
Sent: 7/30/2018 1:10:12 PM
To: Deborah Hawthorne [DHawthorne@ntglobal.com]
Subject: RE: NSPS 40 CFR 60 Subparts OOOO and OOOOa - Annual Reporting

You should make a formal request to the state to authorize the common reporting schedule for NSPS OOOO, OOOOa and Title V facilities, showing how the schedule would not extend any compliance period.

The CEDRI web site has templates for NSPS OOOO reporting and the online reporting portal is active. No courtesy copy emails to EPA except for AR which is not delegated for minor sources, and NM, which did not request delegation for notification and reporting.

NSPS OOOOa templates are available, but the online reporting portal is not active because the rule is under reconsideration. Send NSPS OOOOa reports to Region 6 for all states to R6WellCompletion@epa.gov. NO paper copies.

From: Deborah Hawthorne [mailto:DHawthorne@ntglobal.com]
Sent: Sunday, July 29, 2018 3:14 PM
To: Lundelius, Diana <Lundelius.Diana@epa.gov>
Subject: NSPS 40 CFR 60 Subparts OOOO and OOOOa - Annual Reporting

Ms. Lundelius,

Several of our clients have OOOO applicable compressors that still require annual reporting to update rod packing replacement information. These reports are due by January 13th of each year.

NSPS OOOO 60.5420 (b) states *"You may arrange with the Administrator a common schedule on which reports required by this part may be submitted as long as the schedule does not extend the reporting period."*

While this paragraph was discussing Title V reporting is it possible to include the OOOO applicable affected facilities with a company's OOOOa annual report? This would not extend the reporting period for the OOOO facilities but it would allow a company to have one compliance period and submit a single report. Please let me know what is the proper method for requesting authorization. The only company that I am aware of submitting a joint report just stated the that was what they were doing when they submitted the first annual OOOOa report.

I am also checking on the status of reporting through the CEDRI system. My understanding is the online form has not yet been finalized and therefore in Texas we are to continue sending reports to the TCEQ with an emailed copy to EPA Region 6. Please let me know if there are any changes.

Thank you

Deborah Hawthorne

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